

**David A. Makman/Bar No. 178195**

Law Offices of David A. Makman  
655 Mariner's Island Blvd, Suite 306  
San Mateo, CA 94404  
[david@makmanlaw.com](mailto:david@makmanlaw.com)  
Telephone: (650) 242-1560

**Carlton Odum (pro hac vice)**

Odum Law Offices  
225 West Washington Street, Suite 2200  
Chicago, IL 60606  
[carlton@odumlawoffices.com](mailto:carlton@odumlawoffices.com)  
Telephone: (312) 578-9390

**Attorneys for Plaintiff**

**Sabrina Shafer**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

**SABRINA SHAFER**

Plaintiff,

v.

**SKYLINE ADVANCED  
TECHNOLOGY, SERVICES, a  
California corporation, MICHAEL  
ZANOTTO, ROBERT BERNOSKY,  
RODNEY GUETHER, and DEVIN  
MAULDIN,**

Defendants.

**No. 5:19-cv-00787-CRB**

**Related Case No. 18-cv-06641-CRB**

**STIPULATION TO ALLOW THE  
TAKING OF FACT DEPOSITIONS  
BEYOND THE FACT DISCOVERY  
DEADLINE OF NOVEMBER 11, 2019  
AND ~~PROPOSED~~ ORDER**

Sabrina Shafer (“Shafer”) and Skyline Advanced Technology Services, Michael Zanotto, Robert Bernosky, Rodney Guenther, and Devin Mauldin (collectively the “Skyline Parties”), by and through their respective counsel, stipulate to allow the taking of fact depositions beyond the fact discovery deadline of November 11, 2019. The parties state as follows:

**STIPULATION TO ALLOW THE TAKING OF FACT DEPOSITIONS BEYOND THE  
FACT DISCOVERY DEADLINE OF NOVEMBER 11, 2019 AND ~~PROPOSED~~ ORDER**

1  
2 1. WHEREAS, the deadline for the completion of fact discovery is November 11, 2019.  
3 (ECF No. 33 and ECF No. 59, for case 18-cv-6641 and 19-cv-787, respectively);

4 2. WHEREAS, the parties anticipate at least eight depositions and require additional time  
5 to coordinate witness availability (including several third parties) and to take the depositions;  
6

7 3. WHEREAS, the parties continue to believe that mediation will be most effective  
8 following depositions;

9 4. WHEREAS, the parties seek the court's approval to allow them to complete fact  
10 depositions after the November 11, 2019 deadline for the completion of fact discovery and to move the  
11 Further Case Management Conference to January 17, 2020;  
12

13 5. The parties have conferred and have agreed to seek approval to complete fact  
14 depositions by December 31, 2019. The parties have conferred but have not reached an agreement at  
15 this time to seek an extension of written discovery beyond the November 11, 2019 deadline;

16 6. No prior extensions of time relating to the fact discovery deadline have been requested  
17 or granted;  
18

19 7. The requested extension will impact the following deadlines currently set for the case  
20 (ECF No. 33 and ECF No. 59, for case 18-cv-6641 and 19-cv-787, respectively):

21 a. Close of Fact Discovery due by 11/11/2019;

22 b. A Joint Case Management Statement due by 11/22/2019;

23 c. Further Case Management Conference set for 12/6/2019 at 8:30 AM in San  
24 Francisco, Courtroom 06, 17th Floor.  
25

THEREFORE, IT IS HEREBY STIPULATED by and between Shafer and the Skyline Parties that the parties will have until December 31, 2019 to complete fact depositions and that the Further Case Management Conference currently set for 12/6/19 will be moved to January 17, 2020 (or the next available date thereafter).

IT IS SO STIPULATED.

Dated: October 23, 2019

ODIM LAW OFFICES

By: /s/ Carlton E. Odim  
Carlton E. Odim  
Attorneys for Plaintiff  
Sabrina Shafer

Dated: October 23, 2019

THOITS LAW

By: /s/ Nathaniel Lipanovich  
Nathaniel Lipanovich  
Attorneys for Defendants  
Skyline Advanced Technology Services,  
Michael Zannotto, Robert Bernosky,  
Rodney Guenther, and Devin Mauldin

## FILER'S ATTESTATION

I, Carlton Odim, am the ECF User whose identification and password are being used to file this Stipulation and [Proposed] Order. I hereby attest under penalty of perjury that 1) the content of this document is acceptable to all persons required to sign the document; 2) Defendants' Counsel Nathaniel Lipanovich counsel has concurred with the filing of this document, and 3) a record supporting this concurrence is available for inspection or production if so ordered.

By: /s/ Carlton Odim  
Carlton Odim

1 **ORDER**

2 Pursuant to the parties' stipulation, IT IS SO ORDERED:

- 3 1. That the parties will have until December 31, 2019 to complete fact depositions;  
4 2. Joint Case Management Statement due by January 3, 2020;  
5 3. Further Case Management Conference set for January 17, 2020 at 8:30 AM in San  
6

7 Francisco, Courtroom 06, 17th Floor.

8 Dated: October 25 2019

9   
10 \_\_\_\_\_  
11 UNITED STATES DISTRICT COURT JUDGE  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26